

Capital One Investing, Inc. (“Capital One Investing”) adopted its Privacy Policy with recognition that protecting the privacy and security of the nonpublic personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

Capital One Investing is part of the Capital One family of companies. The [Capital One California Consumer Privacy Act Disclosure](#) also applies to certain information that we and other Capital One affiliates collect about California residents.

WHAT INFORMATION WE COLLECT

We collect certain nonpublic personal information about you (such as your name, address, social security number, etc.) that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

Capital One Investing does not disclose the nonpublic personal information we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers etc.); (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

OPTING OUT OF INFORMATION SHARING

There is no need to opt out of sharing since we do not share clients’ personal information with third parties for marketing purposes, we do not share creditworthiness data with affiliates, or share personal information with affiliates to market to you. Clients cannot opt out of allowing Capital One Investing to share their nonpublic personal information with non-affiliated third parties which are necessary to service their accounts.

REQUESTS FOR INFORMATION

For a copy of this Privacy Notice or our Privacy Policy, please contact the Chief Compliance Officer either by sending a written request to 1600 Capital One Drive, 22nd Floor, McLean, VA 22102, or by phone at (202) 539-1039. Copies of this Privacy Notice and our Privacy Policy are also accessible at our website, www.investing.capitalone.com.

Effective: June 23, 2021.